

MURRAY-NOLAN BERUTTI LLC

Attorneys at Law

Partners

Gwyneth K. Murray-Nolan (NJ, NY, DC)
gwyneth@murray-nolanberutti.com

Ronald A. Berutti (NJ, NY, KY)
ron@murray-nolanberutti.com

Senior Counsel

Thomas M. Grasso (NJ, NY)
tom@murray-nolanberutti.com

Associate

Stephanie Jablonsky (NJ)
stephanie@murray-nolanberutti.com

February 15, 2023

Via ECF

Honorable Brian M. Cogan, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Shaw-Nae Dixon, et al. v. Bill DeBlasio, et al.
Civil Action No. 1:21-cv-05090-BMC
Our File No. 01016

Dear Judge Cogan:

As Your Honor is aware, this firm represents the plaintiffs in the above-referenced matter. We are writing as a follow up to our letter of January 5, 2023, and as a request for a status conference.

The plaintiffs filed a Motion Seeking Leave to Amend, which was fully submitted on September 9, 2022. Further, defendants' Motion to Dismiss for Failure to State a Claim on which Relief Can be Granted was fully submitted on June 9, 2022. On January 5, 2023, this office followed up on our request for oral argument of such motions, and received no response.

While we appreciate that the Court has an extensive docket, we note that in the absence of rulings on the two pending motions, this case is at a standstill. Thus, we respectfully request a status conference in which we can discuss the prospect of advancing discovery while the motions are pending, so that the prejudice of delay does not harm the plaintiffs' ability to advance their case.

We thank Your Honor for consideration of the above.

Respectfully submitted,

MURRAY-NOLAN BERUTTI LLC

Ronald A. Berutti

By: _____
Ronald A. Berutti

RAB:jm

cc: Kerri Devine, Esq. (via ECF)

136 Central Avenue, 2nd Floor, New Jersey 07066 (908) 588-2111

30 Wall Street, 8th Floor, New York, New York 10005 (212) 575-8500 (Please reply to NJ office)